

JOHN C. DORCUS, et al : IN THE
Complainants : CIRCUIT COURT
vs. : FOR
FORD GOELLER & NINA GOELLER : FREDERICK COUNTY
Respondents : NO. 25,171 EQUITY

ANSWER TO SHOW CAUSE ORDER

Ford Goeller and Nina Goeller, Respondents, by their attorneys Charles O. Fisher, Jr. and Walsh and Fisher, answer the Motion for Order Compelling Discovery and Show Cause Order thereon filed in this proceeding, as follows:

1. That counsel forwarded to Respondents on August 23, 1978, a copy of said interrogatories requesting assistance in preparing answers as shown by a copy of a letter to Respondents dated August 23, 1978 attached as Exhibit A and advised counsel for Complainants of the reason for the delay in forwarding the Interrogatories by letter to counsel dated August 23, 1978 attached as Exhibit B.

2. On September 25, 1978, counsel for Respondents again attempted to contact his clients by registered mail through a letter, a copy of which is attached as Exhibit C and again communicated with counsel for Complainants by a letter dated September 25, 1978, a copy of which is attached as Exhibit D.

3. Respondents appeared in the office of their counsel without an appointment in November of 1978 in an apparent response to the letters. In a brief conference, they provided counsel with the basic information which has been included in the Answers to Interrogatories. On Approximately December 1, 1978, Respondents called their counsel at his home and left a message that they were staying in Charlotte, North